

August 20, 2020

VIA ECF

The Honorable Barbara Moses
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20A
New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation*,
Master File No. 1:17-cv-00916-RA-BCM

Dear Judge Moses:

The parties submit this joint letter motion respectfully requesting a stay of all proceedings pending completion of a private mediation. The parties have agreed to participate in a private mediation with Jed Melnick, Esq. of JAMS, on September 30, 2020. To preserve the parties' resources for potential settlement, the parties seek a stay of all proceedings while they pursue mediation. However, the parties respectfully request that the October 15, 2020 evidentiary hearing granted by the Court remain as scheduled in the event mediation is unsuccessful.

Before agreeing to mediate, the parties had discussed seeking an extension of the discovery deadlines to allow sufficient time to complete fact depositions. If the Court grants a stay pending the mediation and the mediation is unsuccessful, the parties expect to request an extension of the current discovery schedule. Thus, the parties propose that upon conclusion of the mediation, the parties will inform the Court within five (5) business days whether a settlement was reached. At that time, the parties will jointly propose either (A) a schedule for filing preliminary approval motion papers with respect to a settlement; or (B) a modification of the operative scheduling order.

Respectfully submitted,

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